EXHIBIT 2

Case 1:03-mol-01570-GBD-FM Document 2062-2-i1Eileos/10406915page12-0660

Law Firm of
Bassim A. Alim & Associates
Ministry of Justice
License No. 98/23



مكتب د. باسم عبدالله عائم ومشاركيه للإستشارات القانونية والمحاماة ترخيص وزارة العدل رقم ٢٣/٩٨

Date: 26/11/2011G Ref: 22565/01/201

Client-Attorney Privileged Information and Correspondence

To: Mr. Martin F. McMahon

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Dear Mr. McMahon;

Thank You for your E-Mail dated 17th. Nov. 2011.

After a detailed discussion with Mr. Jelaidan regarding the discovery requests, I would like to reiterate what we all understand and know but sometimes forget to incorporate in the midst of all the legal jousting that is taking place.

Mr. Jelaidan, was and still is a person with limited maneuvering capabilities due to the freezing of his assets, bank accounts and a plethora of other issues locally and internationally. Mr. Jelaidan went through many hurdles trying to obtain the necessary exculpatory information, but even then as is true now, he is unable to get any satisfactory response from any of the Governmental and commercial entities he corresponded with.

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As Mr. Jelaidan's Lawyer, I can assure all parties concerned that Mr. Jelaidan cannot produce nor procure any further information than what has already been received by the Plaintiffs and the court. All entities contacted by us are simply non-responsive. Both Mr. Jelaidan and Myself are prepared to sign any requested letter for the court to initiate a document request from whichever entity the court finds is relevant. The best method is for the court to seek these document through a formal official request

Last but not least, it is worth mentioning that most of the entities which Mr. Jelaidan is expected to contact and receive the information from, are on the case defendants list, and the plaintiffs should ask them directly instead of the round about way.

via the Saudi Arabian Embassy in Washington which could be more effective.

I remain available for any lending hand in order for justice to be achieved but will not be able to communicate with the given entities any further.

Best Ragards.

Bassim A. Alim, Esq.

Advocate & Legal Consultant

Legal Practice License (98/23)

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